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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JINGLING WU, an individual; WANLING  
LI, an individual; HONGHONG JIANG, an  
individual; RONG WANG, an individual;  
BIYU XIE, an individual; SHAOZHEN  
YAN, an individual; ZHIRONG FU, an  
individual; GUANGJU YAN, an individual;  
QILONG LIAO, an individual; YING ZHU,  
an individual; QING LI, an individual;  
ZIXUN YANG, an individual; QU CHEN, an  
individual; YANXIN ZHOU, an individual;  
XIAOPING HAN, an individual; KAI ZHOU,  
an individual; YIXI LIU, an individual;  
XIAOYING HUANG, an individual; YIHUI  
LIANG, an individual; KAIQING YANG, an  
individual; XIANNA CHEN, an individual;  
ZHIYAN ZHANG, an individual; JINYUN  
YE, an individual; YIRUI CHEN, an  
individual; WENJIAN LIAO, an individual;  
YIRANG LIU, an individual; ZIXUAN  
WANG, an individual; MING LIU, an  
individual; HAOWEN LUO, an individual;  
YANZHAO YANG, an individual;  
LINGFENG XIAO, an individual; YAN LIU,  
an individual; CUI YU, an individual; QUN  
WEN, an individual; JIAXIN YE, an  
individual; RUI WANG, an individual;  
SHAOMEI MO, an individual; SHUHAN

Case No. 2:19-cv-00229-JCM-(PAL)

**STIPULATION AND ORDER TO STAY  
DISCOVERY AND CONTINUE ALL  
DEADLINES INCLUDING RULE 26(F)  
CONFERENCE AND DEADLINE TO  
SUBMIT STIPULATED DISCOVERY  
PLAN AND SCHEDULING ORDER**

**(FIRST REQUEST)**

LIN, an individual; XIN ZHANG, an individual; and HANXIAO HE, an individual (Collectively as “Individual EB-5 Investors”)

Plaintiff,

vs.

ANDREW S. FONFA, an individual;  
WILLIAM WEIDNER, an individual;  
DAVID JACOBY, an individual; SAHARA INVESTMENTS, LLC; LAS VEGAS ECONOMIC IMPACT REGIONAL CENTER, LLC; EASTERN INVESTMENTS, LLC; BOFU, LLC; WEIDNER MANAGEMENT, LLC, and Does 1 through 100, inclusive;

Defendants.

Pursuant to Rules 16(b) and 26(f) of the Federal Rules of Civil Procedure and Local Rules LR 6-1 and 26-1, the undersigned parties hereby stipulate and agree to continue the Rule 26(f) Conference and the submission of the Stipulated Discovery Plan and Scheduling Order as set forth more fully below.

1. On March 4, 2020, counsel for Plaintiffs circulated an email scheduling the Rule 26(f) conference for March 19, 2020.

2. On March 5, 2020, counsel for Defendants circulated an email requesting Plaintiffs to agree to a stay of this matter, including a stay of all discovery, based on the pending Motions to Dismiss that, among other things, raise jurisdictional issues. (ECF 54 & 55).

3. On March 19, 2020, the parties participated in a telephonic Rule 26(f) conference, and a “meet and confer” concerning Defendants’ intention to move for a stay pending resolution of the Motions to Dismiss.

4. During the March 19, 2020 telephonic conference, Defendants indicated they would be filing a Motion to Stay absent an agreement by all parties to stay discovery. Plaintiffs initially stated they would not agree to stay all discovery in this case pending a decision on the Motions to Dismiss. The parties also discussed a temporary stay in this case, based on the pending

Motions to Dismiss, the burdens and costs of discovery and the pending Covid-19 outbreak.

5. Based on the agreement of counsel and the Motion to Stay filed by Defendants (ECF 67), the parties hereby stipulate and agree that discovery in this matter, including Initial Disclosures and any supplemental Rule 26(f) conference, is stayed and shall be continued 60 days from the filing of this stipulation.

6. Subject to further agreement of the Parties or a motion by any of the Parties extending the 60-day stay, the stay shall be lifted at the end of 60 days without any further action or court order.

7. The Stipulated Discovery Plan and Scheduling Order shall be due within 14 days after the stay is lifted.

8. If the Court has not yet ruled on the Motion for a Stay (ECF No. 67) within 60 days of Court approval of this Stipulation, all of the parties reserve their respective rights to seek or oppose a further and additional stay.

IT IS SO AGREED AND STIPULATED

Dated this 27<sup>th</sup> day of March, 2020

Dated this 27<sup>th</sup> day of March, 2020

HOWARD & HOWARD ATTORNEYS PLLC

LEX NOVA LAW  
EIZEN/GOLDSTEIN/RODERICK/SKINNER/  
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LIMITED LIABILITY COMPANY

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David Jacoby*

1 Dated this 27<sup>th</sup> day of March, 2020

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12 *Attorneys for Plaintiffs*

13 IT IS SO ORDERED

14 

15 UNITED STATES MAGISTRATE JUDGE

16 3/30/2020

17 DATED \_\_\_\_\_